

REMARKS

I. Introduction

Claims 7-12 and 27-31 are all the claims pending in the application, and claims 7-12 and 27-31 were examined. Claims 7-12 and 27-31 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Brown, *Using Netscape 2, Que Corp.* (hereinafter "Brown"). Furthermore, claims 28-31 stand rejected under 35 U.S.C. § 112, second paragraph as being indefinite. For at least the reasons given below, Applicant respectfully requests withdrawal of the rejections and allowance of all the pending claims.

II. Formal Matters

Applicant thanks the Examiner for providing a signed and initialed copy of the Information Disclosure Statement filed on January 10, 2000, thereby indicating his consideration of the references cited therein.

III. Claims 28-31, as amended, are sufficiently definite under 35 U.S.C. § 112

Claims 28-31 stand rejected under 35 U.S.C. § 112, second paragraph, as allegedly being "indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention". The Examiner states that "[c]laims 28-31 are considered hybrid claims since they are system claims dependent on independent claim 27 which is a computer-readable medium claim". Applicant has amended claims 28-31 to correct this inadvertent error, and Applicant respectfully requests that the Examiner withdraw this rejection of claims 28-31.

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IV. Claims 7-12 and 27-31 are patentable over Brown

Claims 7-12 and 27-31 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Brown.

A. Independent claim 7

Independent claim 7 recites “a method for managing internet presentation materials in a single file format for ease of administration while presenting to a requestor only those portions of the file requested.” The Examiner cites pages 8-11 of Brown as teaching or suggesting all of the limitations of claim 7. In particular, the Examiner cites figure 1.4 (on page 10 of Brown) as disclosing the step of “generating a page of presentation material in response to a request for said first information, wherein the page is generated based on the first presentation layout and includes said first information and does not contain said second information”, as recited in claim 7.

Applicant respectfully submits that figure 1.4 was used by Brown, along with figures 1.1, 1.2, 1.3, 1.5, and 1.6, to illustrate the diversity of content and participants on the World Wide Web. This point is further highlighted by the appearance of figures 1.1-1.6 in the first chapter, *Internet Fundamentals*, within the context of a subsection labeled *Who Uses the World Wide Web*. Thus, Applicant submits that the lone, static image of figure 1.4 provides no insight into the underlying code representing the content of the web page of figure 1.4, let alone how that code is generated, as recited in claim 7.

The Examiner goes on to explain his interpretation of figure 1.4 as disclosing “when a user selects NFL from the list of items on the left side [of the web page of figure 1.4] and, only

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the information about NFL is displayed on the right side of the page; the information of Cyberspace Showdown III or Raider's Fan Wins Contest! are not shown". Applicant respectfully disagrees with the Examiner's interpretation. Assuming *ad arguendo* that the text on the left-most side of the web page are hyperlinks, which seems to be the case from their underlined representation, figure 1.4 fails to show an NFL hyperlink on the left as the Examiner contends.

Applicant submits that figure 1.4 is a home page for the NFL (National Football League), as evidenced by the URL in the address block of the browser. Applicant also submits that this NFL home page has several hyperlinks spread about the page, with more transitory and perhaps less important content having links off to the side and bottom, as opposed to the main content, *e.g.* NFL Teams, having prominent links in the center of the page. Thus, Applicant submits that the information on the right side of the page is displayed there, not in response to a user request as asserted by the Examiner, but because that is how the home page is laid out. Likewise, no information about Cyberspace Showdown III or Raider's Fan Wins Contest! are shown because a user hasn't activated either of the corresponding hyperlinks yet, which would conventionally cause a new page to load with the corresponding content. Therefore, Applicant submits that Brown fails to teach or suggest "generating a page of presentation material in response to a request for said first information, wherein the page is generated based on the first presentation layout and includes said first information and does not contain said second information", as recited in claim 7.

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Applicant respectfully submits that reliance on a static figure of a web page without an examination of the underlying “code” that represents the web page’s content provides no indication of, for example and not by way of limitation, whether a single file format is used. Furthermore, because the underlying file contents and structure are unknown, Applicant submits that Brown fails to teach or suggest the steps of “defining, in a first portion of the file, a first variable equal to first information and a second variable equal to second information” and “defining, in a second portion of the file, first and second presentation layouts, wherein said first presentation layout includes said first variable and said second presentation layout includes said second variable”, as recited in claim 7.

B. Dependent claims 8-10

Applicant submits that claims 8-10 are patentable over Brown based at least on their dependency from independent claim 7.

C. Claims 11-12 and 27-31

The Examiner noted that claims 11-12 “are for a system of method claims 7-10, and are rejected under the same rationale”. The Examiner also noted that claims 27-31 “are for a system [actually, as amended, a computer-readable medium] of method claims 7-10, and are rejected under the same rationale”. Thus, Applicant submits that claims 11-12 and 27-31 are patentable over Brown for at least the same reasons given above for claims 7-10.

Because Brown, for at least the above reasons, fails to teach or suggest all of the limitations of claims 7-12 and 27-31, the Examiner has failed to establish a *prima facie* case of

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obviousness under § 103(a). Accordingly, Applicant respectfully submits that claims 7-12 and 27-31 are patentable over Brown.

V. Conclusion

In view of the above, reconsideration and allowance of claims 7-12 and 27-31, currently pending in the application, are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Applicant hereby petitions for any extension of time which may be required to maintain the pendency of this case, and any required fee, except for the Issue Fee, for such extension is to be charged to Deposit Account No. 19-4880.

Respectfully submitted,



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APPENDIX

VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

The claims are amended as follows:

28. (Amended) The ~~system~~-computer-readable medium according to claim 27, wherein said presentation information is stored as a value of a variable.
29. (Amended) The ~~system~~-computer-readable medium according to claim 27, wherein a background is stored in the definition area and is combined with the selected presentation definition section for uniform display across the presentation areas displayed on a web browser.
30. (Amended) The ~~system~~-computer-readable medium according to claim 27, wherein the display unit is a web browser.
31. (Amended) The ~~system~~-computer-readable medium according to claim 27, wherein the computer-readable program is a web macro.